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Mr. Sean Sheldrake
Project Coordinator
U.S. EPA, Region 10
1200 Sixth Avenue, M/S ECL-111
Seattle, Washington 98101

RE: Gasco Sediments Site EE/CA

Dear Mr. Sheldrake:

As discussed during the roll-out presentation on May 30, 2012, the draft Gasco Sediments Site EE/CA prepared by NW Natural (NWN) and Siltronic presents a detailed and comprehensive evaluation of alternatives for meeting the Remedial Action Objectives (RAOs) identified in the Statement of Work (SOW). Siltronic is writing independently to reiterate what I stated during that meeting: Siltronic believes that Alternative 2b represents the most effective approach for meeting the RAOs and should be selected by EPA; and, Siltronic wishes to make clear that Alternatives 4 and 5 are not practicable and should not be selected. In summary, Alternatives 4 and 5 cannot be implemented for the following reasons:

- 1) While the EE/CA assigns a non-zero implementability score to each of these two Alternatives, Siltronic maintains that these Alternatives are not consistent with physical constraints of the site and business operations and are, therefore, not implementable at all. As presented in the EE/CA, Alternatives 4 and 5 require removal of significant amounts of the riverbank and upland up to and underneath existing operations-critical facilities on the Siltronic property. Based on past experience and our understanding of the construction methods and fill materials, any riverbank removal activities on the Siltronic property represent significant increased risk of uncontrolled earth movement, injury to workers, and damage to structures. These removals would require lengthy shutdown periods of some or all of the operations. Even if temporary, such business interruption would likely result in permanent loss of customers, ultimately resulting in termination of all Siltronic operations in Portland and the permanent loss of hundreds of jobs. This must be considered an unacceptable outcome for the community.
- 2) Alternatives 4 and 5 would also require removal and reinstallation of the upland source control measures that are currently being installed by NWN on both properties. This outcome is incompatible with the goal of the Statement of Work, which is to ensure that upland sources are controlled to the greatest extent practicable.



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3) The costs of Alternatives 4 and 5 were shown to be clearly disproportionate to the degree of risk reduction predicted by these alternatives. Additional costs, which were not calculated or incorporated into the EE/CA, but which would be required to mitigate engineering risks associated with bank and upland soil removal would enormously increase this disproportionality.

The EE/CA provides a balanced comparison of Alternatives built around available technologies, and clearly demonstrates that Alternative 2b provides the greatest risk reduction most effectively. The EE/CA also demonstrates why Alternatives 4 and 5 should not be selected. This conclusion is consistent with Siltronic's position that Alternatives 4 and 5 are not implementable.

Best regards,

Siltronic Corporation

Myron Burr
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